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July 6, 2011

***Via Electronic Case Filing System***

Honorable Sandra L. Townes  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Moran Towing Corporation v. The Barge New Jersey, et al.*  
11 Civ. 2636 (SLT)

Dear Judge Townes:

We submit herewith on behalf of American Stevedoring, Inc. ("American") a copy of the Order to Show Cause to Vacate Certain Arrest Orders and to Dismiss. We apparently had a problem uploading the papers onto the ECF system this morning.

At present, cargo is currently awaiting transshipment by the barge NEW YORK from Newark to Brooklyn to be loaded onto THE LETOILE (CGM) which will arrive in Brooklyn this evening, and THE HOFUF (NSCSA), which will arrive in Brooklyn tomorrow morning. Any arrest of THE NEW YORK will prevent the transportation of this cargo and immediately impact the steamship lines CGM and National Steamship Company of Saudi Arabia, in addition to customers, manufacturers, distributors and retailers awaiting their shipments from these companies.

We respectfully request that the Court refrain from arresting the NEW YORK until American has the opportunity to contest such arrest at a hearing before this Court.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael S. Hiller", written over a horizontal line.

Michael S. Hiller

MSH:me

c: Alan Weigel, Esq.  
Michael Geraghty, Esq.